

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE: Silas Daniel Elkins</b>	)	<b>Chapter 13</b>
<b>Staci Marie Elkins</b>	)	<b>Case No. 1:19-bk-02824</b>
<b>Debtors</b>	)	
	)	
<b>Ally Bank</b>	)	
<b>Movant</b>	)	
	)	
<b>Silas Daniel Elkins</b>	)	
<b>Staci Marie Elkins</b>	)	
<b>Respondents</b>	)	
<b>Charles DeHart, III, Trustee</b>	)	

**DEBTORS' RESPONSE TO ALLY BANK'S MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY  
PROCEDURE RULE 4001**

1. Movant, Ally Bank, filed its Motion for Relief from Stay on January 15, 2021.
2. Debtors acknowledges some payments are past due.
3. Debtors desires the opportunity to cure the arrears.
4. Debtors requests the Court deny Movant's Motion for Relief.

WHEREFORE, Debtors, Silas Daniel Elkins and Staci Marie Elkins, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed January 15, 2021 by Ally Bank.

Dated: January 15, 2021

Respectfully Submitted,

/s/Stephen Wade Parker  
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